

**FILED**  
**United States District Court**  
06 SEP 12 AM 11:04

SOUTHERN

DISTRICT OF

SHARON L OVINGTON  
UNITED STATES  
MAGISTRATE JUDGE

UNITED STATES OF AMERICA  
V.

MICHAEL J. STERNQUIST

(Name and Address of Defendant)

**CRIMINAL COMPLAINT**

CASE NUMBER: 3 : 06 mi 0210

SHARON L. OVINGTON

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about 9/2/06 in Greene county, in the Southern District of Ohio defendant(s) did, (Track Statutory Language of Offense)

knowingly and without lawful authority produced, in or affecting interstate commerce, an identification document, authentication feature, or a false identification document that was or appeared to be a birth certificate, driver's license, or personal identification card

in violation of Title 18 United States Code, Section(s) 1028 (a) (1) / (b) (1) (A)

I further state that I am a(n) United States Secret Service Special Agent and that this complaint is based on the following facts:

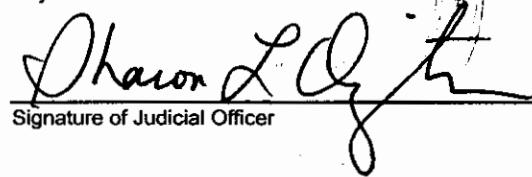
See Attachment "A"

Continued on the attached sheet and made a part hereof:  Yes  No

  
Signature of Complainant

at Dayton, Ohio

City and State

  
Signature of Judicial Officer

September 12, 2006

Date

Sharon L. Ovington, Magistrate Judge

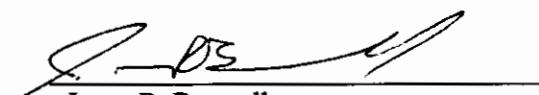
Name & Title of Judicial Officer

Attachment "A"

**AFFIDAVIT**

- 1) I, Jason R. Boswell, being duly sworn, depose and state that I am a Special Agent with the United States Secret Service (USSS) and I have been so employed since December, 2002. I have received training on conducting investigations involving counterfeit securities of the States and private entities, from the United States Secret Service. I am currently assigned to the United States Secret Service Dayton Resident Office and have been assigned to participate in investigations involving fraud and related activity in connection with identification documents, authentication features, and information, specifically violations of Title 18 U.S.C., Section 1028 (a) (1), knowingly and without unlawful authority produces an identification document, authentication feature, or a false identification document.
- 2) This affidavit is made in support of a federal complaint and arrest warrant against **MICHAEL J. STERNQUIST** and **MARIAN A. PLANK**, who knowingly and without authority produced identification documents, authentication features, or false identification documents; to wit: counterfeit State of Illinois driver licenses, counterfeit State of Ohio driver licenses, counterfeit State of Texas driver licenses, counterfeit State of California driver licenses, state seals, a counterfeit United States Department of Defense Identification card, birth certificates, and possessed electronic equipment to manufacture the above listed items.
- 3) The following information is known to me or was reported to me by law enforcement officers involved in this investigation and/or cooperating individuals. This affidavit does not contain all the information derived from the investigation, only that which would be sufficient to demonstrate probable cause.
- 4) On 9/11/06, Detective Jim Combs, Greene County Sheriff's Office, Xenia, OH, contacted your Affiant in regards to **MICHAEL J. STERNQUIST** and **MARIAN A. PLANK**. Detective Combs stated that on 9/2/06, Deputy C. Moore, Greene County Sheriff's Office, Xenia, OH, was dispatched to 1471 W. Dayton Yellow Springs Road, Xenia, OH, on an identity theft complaint. Upon arrival, Deputy Moore met with Kristopher and Margaret Krauss, who stated that they were concerned about Margaret's father, John Seither. They advised that in early August 2006, **MICHAEL STERNQUIST** and **MARIAN PLANK** moved in with John Seither. Since that time, they have been very controlling of his activities and conversations with other family members. They stated that Kristopher Krauss and other family members have personally observed numerous identification cards with different names on them, three (3) computers that had been recently brought into the residence and numerous blank checks with different names on them. Kristopher and Margaret Krauss continued to state that they felt the above mentioned items were being used to manufacture false identification cards.
- 5) Continuing on 9/11/06, Detective Combs advised that he had interviewed Joseph Seither who stated that he had been residing at 1471 W. Dayton Yellow Springs Road, Xenia, OH, with his father John Seither, and had been approached by **MICHAEL STERNQUIST**. **STERNQUIST** explained to Joseph Seither that he could manufacture fake identifications and checks using computer equipment. **STERNQUIST** then demonstrated the process of making templates with various State identification logo's and printed one (1) out on a blank plastic card. Joseph Seither continued to state that **MICHAEL STERNQUIST** also asked him if he would be interested in negotiating a counterfeit check he could manufacture, along with a fake State identification card, in an attempt to start a money market account in order to trade stocks on the Internet.

- 6) Detective Combs also advised that, on 9/2/06, he had obtained a search warrant for 1471 W. Dayton Yellow Springs Road, Xenia, OH. During the execution of the search warrant, numerous items were seized, including blank check stock, numerous false identification cards, genuine State driver licenses, blank white plastic cards, computer equipment, and other equipment indicative of manufacturing false identification cards.
- 7) On 9/11/06, Detective Combs and your Affiant interviewed **MICHAEL J. STERNQUIST**. After waiving his Miranda warnings, **STERNQUIST** admitted to manufacturing the fake State driver licenses for him and **MARIAN PLANK** in an attempt to start a new life in Ohio. **STERNQUIST** stated that he and **MARIAN PLANK** had recently moved to Ohio from Texas together after losing their home. He stated they moved here with no money of their own. **MICHAEL J. STERNQUIST** explained the process as well as the computer software used to manufacture the numerous fake State driver licenses and counterfeit commercial securities. **STERNQUIST** stated he purchased most of the equipment he used to make the counterfeit ID's and checks using the internet, primarily e-Bay. He stated the items were then mailed to him from various locations to his previous residence in Texas and his temporary residence in Ohio. This affiant knows from his experience and training that the e-Bay computer server through which these transactions would have to be processed is located in San Jose, California. **STERNQUIST** continued to advise that he would make names up to put on the counterfeit items, but to his knowledge none of the names on the securities are real.
- 8) **STERNQUIST** stated that he had personally attempted to negotiate only one (1) of the numerous counterfeit securities he had manufactured at a local Wal-Mart, where it was declined. **MICHAEL STERNQUIST** advised that his wife, **MARIAN PLANK**, knew about the manufacturing of the counterfeit ID's and checks and their intended use. This affiant viewed many of the counterfeit ID's and checks which were seized in this matter and noted that many of them were in female names and bore the photo of **MARIAN PLANK**. He admitted he had approached Joseph Seither about working with him and **MARION PLANK** as a check passer.
- 9) Based on the above information, your Affiant believes that probable cause exists that in the Southern District of Ohio, **MICHAEL J. STERNQUIST** and **MARIAN A. PLANK** knowingly and without lawful authority produced a identification document, authentication feature, of a false identification document, a violation of Title 18 U.S.C. Section 1028 (a) (1).
- 10) Further your affiant sayeth naught.



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Jason R. Boswell,  
Special Agent, United States Secret Service

Subscribed and sworn to before me on this 12<sup>th</sup> day of September, 2006.

